

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

MAHMOUD KHALIL, et al.,

*Plaintiffs,*

v.

TRUSTEES OF COLUMBIA UNIVERSITY  
IN THE CITY OF NEW YORK, et al.,

*Defendants.*

No. 1:25 Civ. 02079 (AS)

**SUPPLEMENTAL DECLARATION OF FELICE ROSAN IN SUPPORT OF COLUMBIA  
DEFENDANTS' MOTION TO DISMISS AND OPPOSITION TO PLAINTIFFS' MOTION  
FOR PRELIMINARY INJUNCTION**

I, Felice Rosan, hereby affirm under the penalties of perjury that the following is true and correct:

1. I am the General Counsel of Columbia University ("Columbia" or the "University"). I have served in that position since 2023 and have been employed by Columbia in its Office of General Counsel since 1999.

2. I am familiar with the facts and circumstances surrounding Plaintiffs' allegations. I submit this affirmation in support of Columbia and Acting President Claire Shipman's (the "Columbia Defendants") motion to dismiss the Second Amended Complaint as to the Columbia Defendants and opposition to Plaintiffs' motion for a preliminary injunction. This affirmation is based on my personal knowledge and my review of reports and documents relevant to this matter.

3. On April 17, 2024, a group of protestors erected an encampment on the South Lawn of Columbia's Morningside Campus.

4. On April 30, 2024, protestors entered Hamilton Hall, a building on Columbia's Morningside Campus. The protestors gained access to Hamilton Hall without authorization and at

a time when the building was closed. The protestors barricaded entrances and exits, and they vandalized both the building and University property inside.

5. Students faced University disciplinary proceedings in connection with the encampment and the occupation of Hamilton Hall, or both, for violations of the time, place, and manner restrictions set forth in the Rules of University Conduct (the “Rules”), attached as Exhibit A to the Declaration of Marshall L. Miller in Support of Columbia Defendants’ Motion to Dismiss and Opposition to Plaintiffs’ Motion for Preliminary Injunction (“Miller Declaration”). These disciplinary proceedings were conducted by the University Judicial Board (“UJB”). The proceedings involved adjudication of violations of the Rules for, by way of example, destruction of University property, physically preventing the use of University facilities, entering and/or remaining in University facilities without authorization, and failing to disperse when directed by authorized University officials. On the afternoon of March 13, 2025, after a thorough, months-long process administered by the Rules Administrator and the UJB, respondents in disciplinary proceedings for violations of the Rules related to the April 17-18, 2024 encampment and April 30-May 1, 2024 occupation of Hamilton Hall received the determinations of the UJB in their respective proceedings. The University received the document referred to in Plaintiffs’ papers as the March 13 Letter via email later that day.

6. Under § 443(a)(16) of the Rules, an individual is in violation of the Rules if they fail to self-identify when requested to do so by a properly identified University delegate, an individual appointed by the University to enforce the Rules and warn individuals of potential violations. Section 443(a)(16)’s self-identification requirement has been in place since the inception of the Rules in 1973.

7. In September 2024, Columbia’s Office of Institutional Equity (“OIE”) issued the

University's Anti-Discrimination and Discriminatory Harassment Policies & Procedures for Students (the "Anti-Discrimination Policy"), attached as Exhibit B to the Miller Declaration. On April 1, 2025, OIE incorporated the definition of antisemitism developed by the University's Task Force on Antisemitism into the Anti-Discrimination Policy.

8. The Anti-Discrimination Policy's definition of antisemitism reads as follows: "[A]ntisemitism can manifest in a range of ways, including as ethnic slurs, epithets, and caricatures; stereotypes; antisemitic tropes and symbols; Holocaust denial; targeting Jews or Israelis for violence or celebrating violence against them; exclusion or discrimination based on Jewish identity or ancestry or real or perceived ties to Israel; and certain double standards applied to Israel."

9. OIE has not applied and would not apply the Anti-Discrimination Policy's definition of antisemitism retroactively to conduct that occurred prior to the definition's incorporation into the Anti-Discrimination Policy. Instead, OIE would address such conduct using the principles and definitions applicable before the definition's incorporation.

10. In July 2024, Columbia's Department of Public Safety ("Public Safety") began working with its contract partner to recruit personnel as Special Patrol Officers with enhanced training and authority to deploy on Columbia's Morningside campus. Training for these personnel began in November 2024. Public Safety also began the process of identifying and taking the steps necessary to train Public Safety Officers and Sergeants to become Special Patrol Officers, with training for these Public Safety personnel beginning on March 10, 2025.

11. On February 13, 2025, the U.S. House of Representatives Committee on Education and Workforce (the "Committee") sent a letter to the University requesting disciplinary records relating to 11 incidents that took place on Columbia's campus between April 30, 2024 and January

29, 2025.

12. On February 27, 2025, Columbia made a production of documents in response to the Committee's requests, and the University supplemented its responses on March 7 and 19. Before making these productions, Columbia established a process to apply de-identifying redactions to protect the privacy of persons participating in the disciplinary process. Redactions included students' names and other information that may be identifying, such as, for example, birth date and University ID number. Columbia has not made further document productions to the Committee since March 19, 2025.

13. Columbia has similarly applied de-identifying redactions to other documents produced to the Committee in response to the Committee's earlier requests for production made prior to the February 13 Letter.

Dated: New York, New York  
July 11, 2025

By: Felice Rosan  
Felice Rosan (Jul 11, 2025 17:29 EDT)